

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

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**UNITED STATES OF AMERICA** )  
                                    )  
                                    )  
**VS**                             )     **CRIMINAL ACTION**  
                                    )  
**RUDY VALENCIA,**             )  
                                  )  
                                  )  
**Defendant**                     )

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**DEFENDANT'S FIRST MOTION TO CONTINUE PRETRIAL CONFERENCE**

COMES NOW the Defendant RUDY VALENCIA by and through his undersigned Counsel and files this his motion to continue the pretrial conference in this matter scheduled for August 17, 2011, pursuant to Title 18, United States Code, Section 3161(h)(7)(A). In support of this motion the Defendant shows the following:

1.     Defendant's Counsel has not reviewed the entire discovery for this case.     Counsel for the Defendant has good faith belief in the possibility of motions to be filed based on the materials that have not reviewed by the Defendant's Counsel.
2.     If the pretrial conference were to go forward on August 17, 2011, this would seriously impair counsel's ability to prepare and draft effective motions.
3.     Counsel for Defendant submits that the Defendant's rights will be better protected and the ends of justice will be served by granting this continuance.

Respectfully submitted,

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Rolf A. Jones,  
Attorney for Defendant

Rolf A Jones and Associates, P.C.  
118 North Avenue  
Suite C  
Jonesboro, Georgia 30236  
Tel.: (770)210-3000  
Bar No.: 403260

RAJ:dpk

## **CERTIFICATE OF SERVICE**

I hereby certify that I have prepared the foregoing Motion to Continue Pretrial Conference and proposed Order in compliance with the Court's Local Rules and that a true and correct copy of the foregoing was served electronically via ECF to counsel shown below this 15<sup>th</sup> day of August, 2011 to:

Lisa Tarvin, Assistant United States Attorney  
Michael V. Herskowitz, Assistant United States Attorney  
All co-Defendants counsels

Respectfully submitted,

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Rolf A. Jones,  
Attorney for Defendant

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